

ALC/LHE/SME F. #2016R00505

U.S. Department of Justice

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

April 12, 2017

By ECF and Email

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Re: United States v. Mark Nordlicht, <u>et al.</u> Criminal Docket No. 16-640 (DLI)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017 and April 3, 2017. The government again requests reciprocal discovery from the defendants.

The government has made available at First Choice Copy ("First Choice"), for reproduction to the defendants, emails and other documents pertaining to the following

custodians that were recovered through the search executed at the offices of Platinum Partners on June 22, 2016:

- Brian Jedwab: EDNY-PP-SW1-009416519 EDNY-PP-SW1-009530371;
- Gilad Kalter: EDNY-PP-SW1-009530372 EDNY-PP-SW1-009636263;
- Trey Rogers: EDNY-PP-SW1-009636264 EDNY-PP-SW1-009841610;
- Ari Hirt: EDNY-PP-SW1-009841611 EDNY-PP-SW1-010403984;
- David Bodner and Murray Huberfeld: EDNY-PP-SW1-010403985 EDNY-PP-SW1-010599205;
- Andrew Kaplan: EDNY-PP-SW1-010599206 EDNY-PP-SW1-011116202;
- Avi Newmark and Marcus Fox: EDNY-PP-SW1-011116203 EDNY-PP-SW1-011331531;
- David Steinberg: EDNY-PP-SW1-011331532 EDNY-PP-SW1-013167433;
- Eli Rakower: EDNY-PP-SW1-013167434 EDNY-PP-SW1-013208404;
- Gilad Kalter: EDNY-PP-SW1-013208405 EDNY-PP-SW1-013208923;
- Jack Simony: EDNY-PP-SW1-013208924 EDNY-PP-SW1-013323123; and
- Samuel Salfati: EDNY-PP-SW1-013323124 EDNY-PP-SW1-013324552.

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You may obtain copies of the materials listed above by contacting Joseph Meisner at First Choice at 718-381-1480, extension 212, and referencing the print order number provided by email. First Choice is located at 52-08 Grand Avenue, Maspeth, New York 11378.

Very truly yours,

BRIDGET M. ROHDE Acting United States Attorney Eastern District of New York

By: /s/

Alicyn L. Cooley Lauren H. Elbert Sarah M. Evans Assistant U.S. Attorneys (718) 254-6389 (Cooley)

cc: Clerk of the Court (DLI) (by ECF) (w/o enclosures)